

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Petitioner

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IN RE THE APPLICATION OF:)	
)	
CARMEN FLORES CASTRO,)	Civil Action File No.: 2:18-cv-01739-GMN-CWH
)	
Petitioner,)	
)	
v.)	
)	
BERTHA HERNANDEZ RENTERIA,)	
)	
Respondent.)	

**PETITIONER'S MOTION TO EXTEND TIME TO FILE RESPONSE TO
RESPONDENT'S OBJECTION TO MAGISTRATE JUDGE HOFFMAN'S
NOVEMBER 29, 2018 REPORT AND RECOMMENDATION
(First Request)**

The Convention on the Civil Aspects of International Child Abduction,
done at the Hague on 25 Oct 1980
International Child Abduction Remedies Act, 42 U.S.C. 11604
NRS 125A.120

NOW COMES Petitioner, CARMEN FLORES CASTRO, by and through her attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, and, pursuant to Local Rule IA 6-1, hereby requests that this Court extend the time by one week for Petitioner to file her response to *Respondent's Objection to Magistrate Judge Hoffman's November 29, 2018 Report and Recommendation*, filed on December 13, 2018 [ECF 60].

Respondent's Objection was, as permitted by this Court, in excess of the page limit set by

Local Rule IB 3-2 and Local Rule 7-3 and, including exhibits, totaled 233 pages. As acknowledged by Respondent in her Motion for Leave to Exceed Page Limit [ECF 58], this Court's decision whether to adopt the Report and Recommendations [ECF 56] will have an enormous impact on the parties in this case. The vast issues addressed in Respondent's Objection warrants a meticulous response by Petitioner to protect her and Z.F.M.Z.'s interests in returning the child back to Mexico.

Based on the importance of the Court's decision and due to difficulties with Petitioner's counsel submitting Petitioner's response by Thursday, December 27, 2018, an extension of time to submit Petitioner's response is requested. The undersigned first received Respondent's Objection on Friday, December 14th (the filing was submitted well after business hours on December 13th), while the undersigned was preparing for a trial in another matter scheduled for December 17th. Further, a copy of the transcript from trial has been ordered and is expected to be delivered this week. However, Petitioner's counsel is limited in terms of preparing Petitioner's response until he obtains same. Finally, the upcoming holidays, resulting in reduced time and office staffing, hinders Petitioner's counsel's ability to submit a response by the present December 27th deadline.

WHEREFORE, based upon the foregoing, Carmen respectfully prays that this Honorable Court permit her one additional week—to January 3, 2019—to file her Response to Respondent's Objection.

Respectfully submitted,

Dated: Wednesday, December 19, 2018.

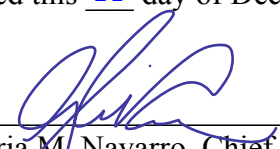
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Petitioner

/s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.
Nevada State Bar Number: 8564

IT IS SO ORDERED.

Dated this 21 day of December, 2018.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Petitioner's Motion to Extend Time to File Response to Respondent's Objection to Magistrate Judge Hoffman's November 29, 2018 Report and Recommendation (First Request)* was filed electronically in the above-entitled matter, on Wednesday, December 19, 2018, with the Clerk of Court for the United States District Court, District of Nevada, by using the Court's CM/ECF system. Electronic service of the foregoing document shall be made by the CM/ECF system to the following registered users of the CM/ECF system:

Richard Gordon, Esq.
Adam Tully, Esq.
Evan Hall, Esq.
Michael Stein, Esq.
Attorneys for Respondent

/s/ David J. Schoen, IV, ACP
An Employee of The Abrams & Mayo Law Firm